

UNITED STATES DISTRICT COURT

WESTERN

for the
DISTRICT OF

OKLAHOMA

In the Matter of the Search of
the Kik Messenger online account
"firefighter9208"

Case No: MJ-22-346-STE

APPLICATION FOR SEARCH WARRANT

I, Scott Muncaster, a federal law enforcement officer or attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

See Attachment A, which is incorporated by reference.

Located in the Western District of Oklahoma, there is now concealed:

See Attachment B, which is incorporated by reference.

The basis for the search under Fed. R. Crim.P.41(c) is (*check one or more*):

- ☒ evidence of the crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description


18 U.S.C. § 1470
18 U.S.C. § 2251

Attempted transfer of obscene material to a minor
Attempted sexual exploitation of a child

The application is based on these facts:

See attached Affidavit of Special Agent Scott Muncaster, HSI, which is incorporated by reference.

☒ Continued on the attached sheet(s).
☐ Delayed notice of [No. of Days] days (*give exact ending date if more than 30 days*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet(s).



Applicant's signature
Scott Muncaster, Special Agent
HSI

Sworn to before me and signed in my presence.

Date: **May 12, 2022**

City and State: 
Lawton, OK



Judge's signature
SHON T. ERWIN, U.S. Magistrate Judge
Printed name and title

**THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Scott Muncaster, a Special Agent with the Department of Homeland Security, Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) since May 2017, and I am currently assigned to the office of the Resident Agent in Charge, Oklahoma City. I am also an investigative member of the Oklahoma Internet Crimes Against Children taskforce. While employed by HSI, I have been involved in investigations of child exploitation matters and computer crimes against children. I am currently assigned to investigate violations of federal law involving the exploitation of children. I have gained expertise in conducting such investigations through in-person trainings, classes, and everyday work in my current role as a Special Agent with HSI.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. I am investigating the online activities of Dylan LILES, who is alleged to have attempted to transfer obscene material to a minor, in violation of 18 U.S.C. § 1470, and attempted to sexually exploit a child, in violation of 18 U.S.C. § 2251(a) and (e), collectively referred to as the “SUBJECT OFFENSES.”

4. This Affidavit seeks authorization to search the Kik Messenger online

account “firefighter9208” (the “SUBJECT ACCOUNT”), utilized in the commission of the SUBJECT OFFENSES and further described in Attachment A, and seize therefrom the items described in Attachment B, which constitute instrumentalities, fruits, and evidence of the SUBJECT OFFENSES.

5. The facts in this Affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

Relevant Electronic and Wire Communication Statutes

6. The relevant federal statutes involved in the disclosure of customer communication records for the requested data in the Subject Account are as follows:

7. Title 18, United States Code, Section 2703(a) provides, in part: “A governmental entity may require the disclosure by a provider of electronic communication service of the contents of a wire or electronic communication, that is in electronic storage in an electronic communications system for one hundred and eighty days or less, only pursuant to a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.”

8. Title 18, United States Code, Section 2703(b)(1) provides: “A governmental entity may require a provider of remote computing service to disclose the contents of any wire or electronic communication . . . without required notice to the subscriber or customer,

if the governmental entity obtains a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.”

9. Title 18, United States Code, Section (c)(1) provides: “A governmental entity may require a provider of electronic communication service or remote computing service to disclose a record or other information pertaining to a subscriber to or customer of such service (not including the contents of communications) only when the governmental entity—(A) obtains a warrant issued using the procedures described in the Federal Rules of Criminal Procedure by a court of competent jurisdiction.”

10. Title 18, United States Code, Section 2510(1) defines a “wire communication” as “any aural transfer made in whole or in part through the use of facilities for the transmission of communications by the aid of wire, cable, or other like connection between the point of origin and the point of reception furnished or operated by any person engaged in providing or operating such facilities for the transmission of interstate or foreign communications or communications affecting interstate or foreign commerce.”

11. Title 18, United States Code, Section 2510(12) defines “electronic communication” as “any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic or photo optical system that affects interstate or foreign commerce,” with certain exceptions not applicable here.

12. Title 18, United States Code, Section 2510(17) defines “electronic storage” as “any temporary, intermediate storage of a wire or electronic communication incidental

to the electronic transmission thereof” and “any storage of such communication by an electronic communication service for purposes of backup protection of such communication.”

13. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. §§ 2703(a), (b)(1)(A), (c)(1)(A) and 2711. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

BACKGROUND ON KIK MESSENGER

14. As explained below, there is probable cause to believe that LILES committed the SUBJECT OFFENSES, in part, through the use of Kik Messenger—a free service easily downloaded from the Internet. Kik advertises itself as “the first smartphone messenger with a built-in browser.” According to the company’s website, Kik Messenger has become the simplest, fastest, most life-like chat experience one can use on a smartphone. Unlike other messenger apps, Kik usernames - not phone numbers - are the basis for Kik user accounts, so Kik users are in complete control of with whom they communicate. In addition, Kik features include more than instant messaging. Kik users can exchange images, videos, sketches, stickers and even more with mobile web pages.

15. The Kik app is available for download via the App Store for most iOS devices such as iPhones and iPads and is available on the Google Play Store for Android devices. Kik can be used on multiple mobile devices, including cellular phones and tablets.

16. In general, Kik asks each of its subscribers to provide certain personal

identifying information when registering for an account. This information can include the subscriber's full name, physical address, and other identifiers such as an e-mail address. However, this information is not verified by Kik.

17. Kik typically retains certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account. Kik often has records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the account. In addition, generally Kik maintains at least the last 30 days of all communications for each Kik user.

18. Kik offers users the ability to create an identity within the app referred to as a "username." This username is unique to the account and cannot be changed. No one else can utilize the same username. A Kik user would have to create a new account in order to obtain a different username. In addition to a username, a Kik user may display a traditional name within the app, hereinafter referenced as the user's "handle."

19. Given the ability for users to create multiple accounts that are not linked to a specific mobile device (i.e., a phone number), Kik has become a popular app used by

people involved in the collection, receipt, and distribution of child pornography

STATEMENT OF PROBABLE CAUSE

20. On or about December 6, 2021, LILES, using Kik, with the username “firefighter9208”, the “SUBJECT ACCOUNT”, and handle “Dylan Adams,” initiated a chat dialogue with an HSI Special Agent, acting in an Undercover (UCA) capacity as a 13-year-old girl from New Jersey on Kik. The following is a summary of the conversation between the UCA and LILES, utilizing the Kik social messaging application and SMS text messaging from December 6, 2021, to March 30, 2022:

a. On December 6, 2021, the UCA received an unsolicited message from firefighter9208—to which I have probable cause to believe is LILES’S Kik username, as explained below—stating, “Hey what’s up.” After the UCA responded to LILES, LILES told the UCA that he had been a firefighter for 12 years, starting in Kansas and now in Oklahoma. After additional back-and-forth, LILES told the UCA that he was 28 years old, to which the UCA replied that she was too young for him and did not want to get into trouble. LILES next asked the UCA how old she was, and the UCA stated that LILES could get into trouble. LILES continued to press the issue, promising not to report the UCA. The UCA then told LILES that she was 13 years old. After additional conversation, LILES asked the UCA to “come be [his] company.”

b. The UCA and LILES continued to chat over the subsequent days. On December 28, 2021, LILES asked the UCA for a picture. The UCA provided a picture of herself standing in a bathroom in a black shirt. Upon receiving the photograph, LILES told

the UCA that he was “kinda horny,” and asked the UCA, “[w]anna help me” and “what naughty things have you done?” As to the latter question, the UCA responded, “not much im only 13 remember lol.” LILES proceeded to ask the UCA a series of sexually charged questions, including, “you ever touched a guy,” “been touched,” and “where was the touching at?” LILES then asked the UCA for additional pictures, promising to not “blast anything” and that he would “just enjoy it,” adding a winking emoji to the latter message.

c. After additional back-and-forth, LILES messaged the UCA, “I’d touch you right. You would love it. Especially when I use my tongue on your vagina.” LILES also told the UCA, “I’m touching myself to your picture,” and proceeded to send the UCA a photograph of an erect penis, alongside the message, “Do you have any cute friends with kik?” Thereafter, LILES asked the UCA if she received his picture and noted, “That was because of your picture.” LILES then asked the UCA for a picture of her boobs, to which the UCA responded, “I don’t want to.” Later, the UCA sent LILES a picture purporting to be of herself. The picture depicted the UCA in the bathroom wearing a tank top. LILES responded, “I can’t see anything.”

d. On December 29, 2021, at approximately 10:48 AM EST, LILES messaged the UCA, “Good morning gorgeous!” In reference to LILES’S Kik handle, the UCA asked LILES if Dylan is his real name, to which LILES responded, “Yes it is.” After additional back-and-forth regarding LILES’S pet dogs, LILES told the UCA to “come play.” The UCA then asked LILES if they could text instead of using the Kik app and sent LILES her phone number.

e. On the same day, at approximately 11:36 AM EST, the UCA received a text from phone number 580-725-7419, stating “Hello gorgeous.” As explained in more detail below, based on information from that number’s cellular service provider, I have probable cause to believe the number was used by LILES during the relevant period. The conversation continued over the next several days. On December 31, 2021, LILES asked the UCA, “Can I see you?” On January 1, 2022, LILES messaged the UCA, “Come hang out with me.” In reference to New Year’s Eve, LILES also asked the UCA, “Did you get a kiss at midnight,” and “[h]ow about we kiss lol.” On January 5, 2022, LILES asked the UCA for a picture, to which the UCA sent him a picture purporting to be of herself in a black top. Upon receiving the picture, LILES responded, “Come over lol.”

f. The UCA did not again communicate with LILES for nearly a month. On February 2, 2022, LILES messaged the UCA via Kik, stating that his phone broke and he had lost his contacts. The UCA responded on February 14, 2022, with “hey.”

g. On February 17, 2022, at approximately 2:23 PM EST, LILES messaged the UCA via Kik, asking, “What’s up” and “[c]an I see you?” After additional back-and-forth, the UCA asked for a picture of LILES, to which LILES responded, “Let me see you first lol.” The UCA next sent a picture purporting to be of herself in a bathroom wearing a tank top, to which LILES responded, “I’d love to see more of you.” LILES also responded with a picture of himself with no shirt on. LILES also asked the UCA, “Can I see your body?”

h. On February 28, 2022, the UCA sent LILES a Kik message “hey.” The

UCA received a message stating LILES'S phone has been off/disconnected for a while and the message would be delivered when LILES connects again.

i. On March 23, 2022, the UCA reinitiated contact with LILES via Kik. On March 30, 2022, at approximately 3:45PM EST, LILES sent the UCA a photograph of an erect penis, alongside the messages, "I'm horny" and "can I see you?" After additional back-and-forth, the UCA told LILES that she was walking around with her mother because she was too young to stay home alone. The UCA noted that she could stay home alone once she turned "14," to which LILES responded, "Well damn 14 needs to hurry up."

j. That same day, LILES asked the UCA, "you want to come shower with me?" LILES proceeded to describe in detail what he would do to the UCA were they alone together: "How about I pick you up and grasp your butt while you wrap your legs around me and carry you to the room;" "[t]hen I gently lay you down on the bed and slowly kiss your lips, down your neck, chest, stomach;" "slowly kissing your inner thighs and slowly moving closer to your vagina;" "[w]hile kissing your vagina my tongue will gently go across your clit, my hand will be on your boob, your back will start to bow;" "I'll slowly enter one finger inside you as I keep using my mouth;" "[t]hen I'll kiss my way back up your body and slowly enter my dick inside you; and "[t]hen right before I get off I'll pull out and cum all over you." The UCA last made contact with LILES on April 19, 2022.

21. The UCA conducted a search of phone number 580-725-7419 within a commercially available public records database. The search revealed that phone number 580-725-7419 was assigned to subscriber, Onvoy, LLC.

22. On or about January 3, 2022, an HSI summons was issued to Onvoy, LLC, requesting information regarding cellular telephone number 580-725-7419.

23. On or about January 27, 2022, from the summons results, it was determined that telephone number 580-725-7419 is assigned to service provider TextNow, Inc.

24. On or about January 31, 2022, an HSI summons was issued to TextNow, Inc., requesting information regarding telephone number 580-725-7419.

25. On or about January 31, 2022, from the summons results, it was determined that telephone number 580-725-7419 was assigned to an account with username dylanliles08, an associated email address dylanliles08@gmail.com, and the Registration Internal Protocol (IP) 160.3.191.198. The information received from TextNow also revealed an active use date for the number from December 29, 2021, to January 29, 2022.

26. On March 9, 2022, I used commercially available software to determine that the IP address 160.3.191.198 is registered to the Internet Service Provider Cable One Inc. a/k/a/ Sparklight. Results received from Sparklight, in response to a summons dated March 10, 2022, revealed that the IP address is assigned to Chloe Gamblin at 1109 N 11th Street, Duncan, Oklahoma 73533, hereinafter referred to as the "SUBJECT PREMISES." According to Sparklight records, Chloe Gamblin's account is active, and she has been a customer since September 28, 2020.

27. Open-source research revealed LILES is a resident of the SUBJECT PREMISES. I also determined that LILES is married to Chloe Gamblin.

28. On Friday, March 18, 2022, I traveled to Duncan, Oklahoma, to conduct

visual surveillance of the SUBJECT PREMISES. In doing so, I observed a white Dodge Ram pickup truck (with License Number OK #KOZ-811) parked in front of the residence. Records indicate that the Ram in question is registered to Dylan Liles.

29. On March 25, 2022, a summons was sent to Media Lab-KIK for Kik username “firefighter9208.” Information received from Media Lab-KIK revealed that username “firefighter9208” is registered to “Dylan Adams” with an associated email of dylanliles07@gmail.com.

30. I also ran an Accurint Virtual Identity Report on LILES. The Report listed LILES’S address as that of the SUBJECT PREMISES. In addition, the report listed dylanliles07@gmail.com as an associated email account.

31. On April 8, 2022, I applied for and received a federal search warrant for LILES’S residence from Magistrate Judge Amanda Green. The search warrant was executed on April 21, 2022.

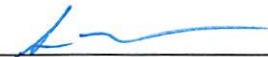
32. Upon execution of the search warrant, LILES, Chloe Gamblin, and their four minor children were encountered at the SUBJECT PREMISES by Duncan Police Department Special Response Team personnel.

33. During the search of LILES’S bedroom, agents found a bright blue fleece blanket on LILES’S bed matching the image of a blanket in the background of the explicit photographs LILES sent the UCA. The agents also observed a flat screen television mounted over a short television stand that match a corresponding television and stand in the background of the explicit photographs.

34. During an audio/video recorded, consensual interview of LILES, HSI Agents provided LILES printouts of the Kik chat between Kik account user “firefighter9208” and the UCA. LILES stated that the profile picture associated to the account “firefighter9208” was in fact him and that it was his account. He otherwise denied that he had sent the chats in question to the UCA, however, and claimed he had not used Kik in some time.

CONCLUSION

35. Based on the foregoing, there is probable cause to believe that the SUBJECT OFFENSES have been violated, and that the contraband, property, evidence, fruits and instrumentalities of these offenses, more fully described in Attachment B, are located within the SUBJECT ACCOUNT. I respectfully request that this Court issue a search warrant authorizing the search of the SUBJECT ACCOUNT described in Attachment A to seize the items described in Attachment B.



Scott Muncaster
Special Agent
Homeland Security Investigations

SUBSCRIBED AND SWORN to before me this 12th day of May, 2022.



SHON T. ERWIN
United States Magistrate Judge

ATTACHMENT A

PROPERTY TO BE SEARCHED

This warrant applies to information associated with the Kik Messenger online account “firefighter9208” which is stored at premises controlled by MediaLab, a company based in the United States, which accepts legal process via <https://app.kodex.us/signin> Government Request Portal.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

To the extent that the information described in Attachment A is within the possession, custody, or control of Kik c/o MediaLab (the “Provider”), including any emails, messages, images, videos, records, files, logs, or information that has been deleted but is still available to the Provider, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose the following:

1. IP addresses associated with Kik account “firefighter9208” from December 1, 2021, to April 21, 2022;
2. All transactional chat logs associated with Kik account “firefighter9208” from December 1, 2021, to April 21, 2022;
3. The content of all messages associated with Kik account “firefighter9208” sent and received from December 1, 2021, to April 21, 2022;
4. All images and video associated with Kik account “firefighter9208” including the unknown usernames and IP address associated to the sender of the images and video from December 1, 2021, to April 21, 2022;
5. A date-stamped log showing the usernames that Kik account “firefighter9208” added and/or blocked from December 1, 2021, to April 21, 2022;
6. Any abuse reports associated with Kik account “firefighter9208” including any unknown usernames from December 1, 2021, to April 21, 2022;

7. The Registration IP address and emails associated with Kik account “firefighter9208” from December 1, 2021, to April 21, 2022.